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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
22 Defendants.
23

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
ITS OPPOSITION TO OTTO
TRUCKING'S SUMMARY
JUDGMENT PRECIS (DKT. 1334)**

Trial Date: October 10, 2017

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff's Administrative Motion to File Under Seal Its Opposition to Otto Trucking's Summary Judgment Precis (Dkt. 1334).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo's Opposition to Otto Trucking's Summary Judgment Precis ("Opposition")	Blue-highlighted
Exhibit 1 to Waymo's Opposition	Entire Document

3. The blue-highlighted portions of Waymo's Opposition and the entirety of Exhibit 1 contain highly confidential information regarding the negotiation, evaluation, and structure of an ongoing business agreement. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors to gain insight into how Uber has negotiated and structured its business agreements, allowing them to tailor their own negotiation and business strategy, such that Uber's competitive standing could be significantly harmed.

4. Defendants' request to seal is narrowly tailored to those portions of Plaintiff's Opposition and its supporting exhibits that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28th day of August, 2017, in Washington, D.C.

/s/ Michelle Yang

Michelle Yang

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2 **ATTESTATION OF E-FILED SIGNATURE**
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I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

5 Dated: August 28, 2017
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6 /s/ *Arturo J. González*
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